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The Performance of the BBC - BBC Services: Audiences in Wales

This response is submitted on behalf of Cytûn – Churches Together in Wales. Cytûn is the umbrella body for the main Christian denominations in Wales and a number of other Christian organisations are also members. The member denominations have a total membership of some 168,000 adults in all communities in Wales, and contact with an extensive number again of adults, children and young people. Local churches operate through the medium of Welsh, English and a number of other languages. A full list of our members can be seen at:

<http://www.cytun.cymru/ni.html>

We welcome the opportunity to respond to this consultation. The response was drawn up following consultation with church and society officers of our member denominations and organisations, and with other individuals within the membership of our churches who have experience in the field. We concentrate on the aspects that relate specifically to Wales. We have taken into consideration in this response the full response from our member denomination, the Presbyterian Church of Wales, which was sent to you separately.

1. Do you agree with our overall approach to setting the operating licence?

We believe that the BBC and OFCOM in all their activity should follow the principle of the Welsh Language Measure, namely to treat the Welsh and English languages on the basis of equality in Wales. We believe that **this should be included in the high level objectives**, and that this includes not only programmes and material produced by the BBC in Wales, but everything that is broadcast or available in Wales. We understand that it would not be possible to ensure equality between Welsh language hours and English language hours across the BBC, but we believe that there is a need to consider how to reflect the official status of the Welsh language in Wales in everything the BBC does. One example would be to see whether it is possible to change the practice of dubbing all contributions made in Welsh when broadcasting the National Assembly for Wales on BBC Parliament and Prime Minister's Questions on BBC2 Wales. Would it be possible to use the red button for the translation, thus allowing the original language to be broadcast on the main channel? (Or, possibly, the other way around?)

Another example that has arisen since publication of the consultation document, is support for Radio Cymru 2. This is a service that tries to fill one of the many gaps in the Welsh language broadcasting provision which the market has failed to achieve. No-one else offers a Welsh-language breakfast show nationally. We believe that OFCOM should declare publicly that it supports and welcomes RC2, as a new, different offer, for which there has been a great demand from users.

2. Do you agree with the approach we have proposed for public purpose 1, including the high-level objectives and regulatory conditions we are proposing?

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We do not believe that para 4.43.2 in the consultation document "Holding the BBC to account" does justice to the role of devolved legislatures. See also our comments in response to Question 5 below.

3. Do you agree with the approach we have proposed for public purpose 2, including the high-level objectives and regulatory conditions we are proposing?

In general, yes. But note our comments regarding the Welsh language under Question 2 above. We believe there are failures in the market for the provision of formal and informal educational material through the medium of Welsh, and that the BBC should take that into consideration in deciding on its on-line provision in Welsh. Whilst it could be argued that some of the BBC's on-line educational provision in English competes with private providers in the market that is hardly true in the case of Welsh language provision.

4. Do you agree with the approach we have proposed for public purpose 3, including the high-level objectives and regulatory conditions we are proposing?

Yes. We believe that para 4.70 again suggests, in the case of Wales, that more material through the medium of Welsh should be provided. This would improve the "mix" (a), the percentage produced in the UK (c) "creative ambition and risk taking" (d) and "serving diverse audiences". We believe this should be acknowledged more fully in the draft Licence, particularly in Schedule 1.

5. Do you agree with the approach we have proposed for public purpose 4, including the high-level objectives and regulatory conditions we are proposing?

Cytûn welcomes public purpose (4) especially the requirement to serve Wales (and other countries and regions). This is in accordance with what Cytûn requested in responding to the Government's consultation regarding a new Charter for the BBC. We believe that the principles presented in paragraph 1.31 of the Draft Licence reflect this Purpose and how it should be turned into practical action.

But we are disappointed regarding some of the specific requirements presented in Schedule 2 to realise this. Bearing in mind our general comments in our paragraph 1 above, if it is OFCOM's intention to introduce detailed requirements for every service, we feel that the requirements for Wales in Schedule 1 are defective as they currently stand. Specifically, we would draw attention to the following:

2.52 The total of 300 hours per year on BBC Parliament for the parliaments of Wales, Scotland and Northern Ireland together is much too low a total considering the importance of those parliaments not only to the devolved nations but also the whole of the UK – in terms of policy differences, and one country learning from another as increasingly happens (e.g. Charging 5p for plastic bags or the system of opting out of organ donation, two policies which started in Wales without much awareness in the remainder of the UK but which are now being adopted in other UK countries). We believe that OFCOM could ensure that BBC Parliament provides better representation for these elected parliaments, and somewhat less for the House of Lords. A noteworthy example of this shortcoming was that BBC Parliament had continued to broadcast from the House of Lords in June 2016 when the Welsh Assembly was unable to elect a First Minister.

2.66.1 We feel that 275 hours per week of news and public affairs on BBC is too low, especially considering the failure of the market in Wales to meet the need for news and public matters specifically about Wales (see, for example [The Institute of Welsh Affairs Media Audit](#) in 2015). It is totally unacceptable that the totals set down for Scotland (2.59.1) and Northern Ireland (2.72.1) are substantially higher. We believe that the figure for Wales should be equal to the 310 hours in Northern Ireland.

2.66.2 The 65 hours per year dedicated to non-news programmes on BBC One Wales is amazingly low – little more than one hour per week. 155 hours are set down for Scotland (2.59.2) and 90 for Northern Ireland. Bearing in mind that the BBC has now announced the establishment of a separate English language channel in Scotland, in addition to these hours, we believe that the dedicated hours in Wales should be higher than those in Scotland, as Wales does not have a separate English channel.

2.68 The same considerations are true of BBC Two Wales, particularly since some of these hours could be supplied by repeating programmes rather than creating new ones.

2.8.1 and 2.10.1 We are very much aware that the majority of viewers and listeners in Wales receive their programmes via providers (including the BBC) that are not located in Wales. The BBC is not expected to change that situation of its own accord, but the BBC does have special responsibility here as it is one body that broadcasts across Britain from outside Wales and not from within. We would like to see Ofcom insisting that some of the news service on Radio 1 and/or Radio 2 is produced in Wales during peak hours in order to try to tackle the democratic deficit and the lack of information about Wales among those receiving their news from Britain-wide sources only.

6. Do you agree with Ofcom's approach to how we will set and amend the operating licence, as set out in Annex 5?

In Schedule 5 A5.5 we believe that a public consultation should be ensured on all changes to the BBC licence, and that the consultation in question should in all cases include consultation with the National Assembly for Wales, in order to ensure input from elected representatives in Wales.

7. Do you agree with our proposed overall approach to performance measurement?

We understand that this new regulation system is an important development for OFCOM and the BBC. We understand the desire to set down a minimum number of hours for certain types of programmes and to set standards for the BBC's output. But we believe that the BBC's accountability for broadcast and output standards should not turn into shackles and rules that could restrict the BBC's ability to innovate and respond to the public's demands in new areas by limiting it to specific aims set down at the beginning of the process. This is especially true as so many benchmarks have been set so that they can interact in ways that cannot currently be foreseen, and perhaps create unintended results. It is not easy to evaluate audience appreciation, the public value of something, in a graph and a target. We therefore urge wisdom on OFCOM's part as it tries to ensure that all large public bodies are accountable but not overly-burdened.

8. Do you agree with the proposed framework of: availability; consumption; impact; contextual factors?

We believe that elected members should be included on the list of stakeholders that are consulted. Perhaps "experts" is not the best description of them, and that a separate category should be considered for them. In the case of broadcasting in Wales, Assembly Members would be especially important in this respect, but also Members of Parliament and local councillors (and, for the time being, Members of the European Parliament).

9. Do you agree with Ofcom's approach to how we will set and amend the performance measures

See our response to Question 7.



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Swyddog Polisi'r Cynulliad Cenedlaethol / National Assembly Policy Officer

Gethin Rhys (on behalf of Cytûn)
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